

### **REMARKS**

Reconsideration and allowance of the instant application in view of the following Amendment and Remarks is respectfully requested. Claims 1-32 remain pending in the application.

Applicants would like to thank Examiner Yuan for the helpful telephone interview conducted on December 15, 2003. As discussed during the interview, Applicants have filed a RCE along with amendments to independent claims 1, 12, 23, and 32 to help clarify the claim language. In addition, dependent claims 4, 6, 9-11, 20-22, and 29-31 have been amended to correct certain informalities. No new matter has been introduced into the application. With these Amendments, Applicants respectfully submit that claims 1-32 are in condition for allowance. A notice to this effect is earnestly requested.

### **Claim Objections**

Claims 4 and 6 were objected to as containing certain informalities in the Office Action mailed on 6/18/03. The claims have been amended in the manner suggested by the Examiner. Applicants respectfully submit that claims 4 and 6 are now in condition for allowance.

### **Rejections under 35 U.S.C. § 112, First Paragraph & Second Paragraph**

In the Office Action mailed 6/18/03, claims 1-32 were rejected under 35 U.S.C. 112, first paragraph and second paragraph. Based on the interview with Examiner Yuan, independent claims 1, 12, 23, and 32 have been amended to clarify the claimed invention of the present application. Based on these amendments, Applicants respectfully submit that the rejections under 35 U.S.C. 112 first and second paragraphs have been rendered moot. Therefore, Applicants respectfully submit that claims

1-32 are in condition for allowance.

**Rejections under 35 U.S.C. § 102**

In the Office Action mailed 6/18/03, claims 1-3, 7-8, 12-13, 15, 19, 23-24, 26, 28, and 32 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Number 6,144,974 to Gartland.

Of the rejected claims, claims 1, 12, 23, and 32 are the only independent claims.

Claim 1 now includes the feature of “in response to step a) modifying at least a portion of the plurality of formatting variables, other than the variable specified in a), such that the modified variables are optimized for readability.” Support for this claimed feature can be found in the specification beginning on page 12, line 20 which states:

FIG. 6 illustrates an example of a document 622 after modification of a user-modifiable formatting value. For example, if the document in FIG. 4 corresponds to a font reference value of “small”, the document 622 shown in FIG. 6 is the result of a user changing the font reference value to “large”. In addition to a large font size 616 and adjusted leading 618, the text in FIG. 6 is no longer justified and a serified font is used. Furthermore, the top and bottom margins 606, 608, left and right margins 610, 612 and the line length 614 have been adjusted as well. . . . In accordance with the present invention, the adjustments to these variables 606-618 are in response to the change in font reference value and are based on optimized formatting values.

In contrast to what is claimed in claim 1, Gartland discloses a system for repositioning a content object on a page in response to a request to change the page framework. In column 4, lines 9-24, Gartland describes the page framework settings as including page size, orientation, margin width, column information and the positions of ruler guides. As shown in figure 2 and described in columns 3 and 4, after the user requests to change the framework, the page layout is redefined in step 204. As described in column 5, lines 27-29, alignment and reposition data is computed based on

inferred relationships between the content objects and page framework members in the original page layout. The Gartland system is concerned with recasting content automatically on a page in response to a change in the page framework. *See* col. 2, lines 18-23. Gartland does not teach or suggest “in response to step a) modifying at least a portion of the plurality of formatting variables, other than the variable specified in a), such that the modified variables are optimized for readability.”

For at least these reasons, Applicants respectfully submit that claim 1 is patentable over Gartland. Independent claims 12, 23, and 32 have also been amended to contain similar claimed elements and are allowable for similar reasons. The claims which depend from claims 1, 12, 23, and 32 are allowable for at least the same reasons as the claims from which they depend.

In the Office Action mailed 6/18/03, claims 1-2, 5-6, 12-14, 17-18, and 23-25 stand rejected under 35 U.S.C. 102 (e) as being anticipated by U.S. Patent Number 6,493,734B1 to Sachs, et al.

Sachs et al. discloses a system for generating and switching page display views on a portable electronic book. In column 4, line 66 - column 5, line 14, Sachs et al. describes allowing the user to make a font size selection. Sachs et al. does not teach or suggest “in response to step a) modifying at least a portion of the plurality of formatting variables, other than the variable specified in a), such that the modified variables are optimized for readability” as now claimed in claim 1. Sachs et al. does not discuss improving readability. In fact, in column 5, lines 38-59, Sachs et al. teaches extracting text flow information directly from the ebook source files.

For at least these reasons, Applicants respectfully submit that claim 1 is patentable over Sachs et al. Independent claims 12, 23, and 32 have also been amended to contain similar claim elements and are allowable for similar reasons. The claims which depend from claims 1, 12, 23, and 32 are allowable for at least the same reasons as the claims from which they depend.

**Rejections under 35 U.S.C. §103**

In the Office Action mailed 6/18/03, claims 4, 16, and 27 stand rejected under 35 U.S.C. 103 (a) as being unpatentable over Gartland.

Claims 4, 16 and 27 ultimately depend from independent claims 1, 12, and 23, respectfully and are allowable for at least the same reasons as the claims from which they depend.

Claims 9-11, 20-22, and 29-31 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Gartland in view of Microsoft Corporation, *Microsoft Word 6.0 User's Guide* (1994), pp. 113-115 and 142-144.

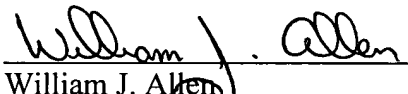
Claims 9-11, 20-22, and 29-31 are dependent claims and are allowable for at least the same reasons as the claims from which they depend.

**CONCLUSION**

In view of the above discussion, Applicants respectfully submit that claims 1-32 are in condition for allowance. Reconsideration and allowance of claims 1-32 is respectfully requested. Should the Examiner believe that a conversation with the Applicant's representative would be useful in the prosecution of this case, the Examiner is invited and encouraged to call the Applicant's representative.

Respectfully submitted,

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